

EXHIBIT 51

DOCUMENT PRODUCED IN NATIVE FORMAT



INTERNET PHARMACIES

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Deputy Assistant Administrator
Office of Diversion Control
Drug Enforcement Administration



National Synthetic Drug Strategy

- Focuses on illicitly manufactured synthetic drugs and diverted pharmaceutical products
- Provides a blueprint for action under the President's National Drug Control Strategy
- Multi-agency effort
- Key pharmaceutical investigation components
 - Increase Internet investigations
 - Target OxyContin® and Vicodin® diversion
 - Share law enforcement 'best practices'



DEA Registrant Population

Current Number of
DEA Registrants

1,253,711

2007

As of March 23, 2007



480,000

1973



Registrant Population

Total CSA Registrants **1,253,711**

RETAIL LEVEL		WHOLESALE LEVEL	
Retail Pharmacy	64,917	Manufacturer	513
Hospital /Clinic	16,286	Distributor	823
		Reverse Distributor	42
Practitioner	1,023,770	Researcher	5,798
		Dog Handlers	2,172
Teaching Institution	536	Analytical Lab	1,559
Mid-Level Practitioner	133,409	Importer	188
		Exporter	237
		Narcotic Treatment Program	1,238

Chemicals* **2,223**



DIVERSION OF CONTROLLED SUBSTANCES



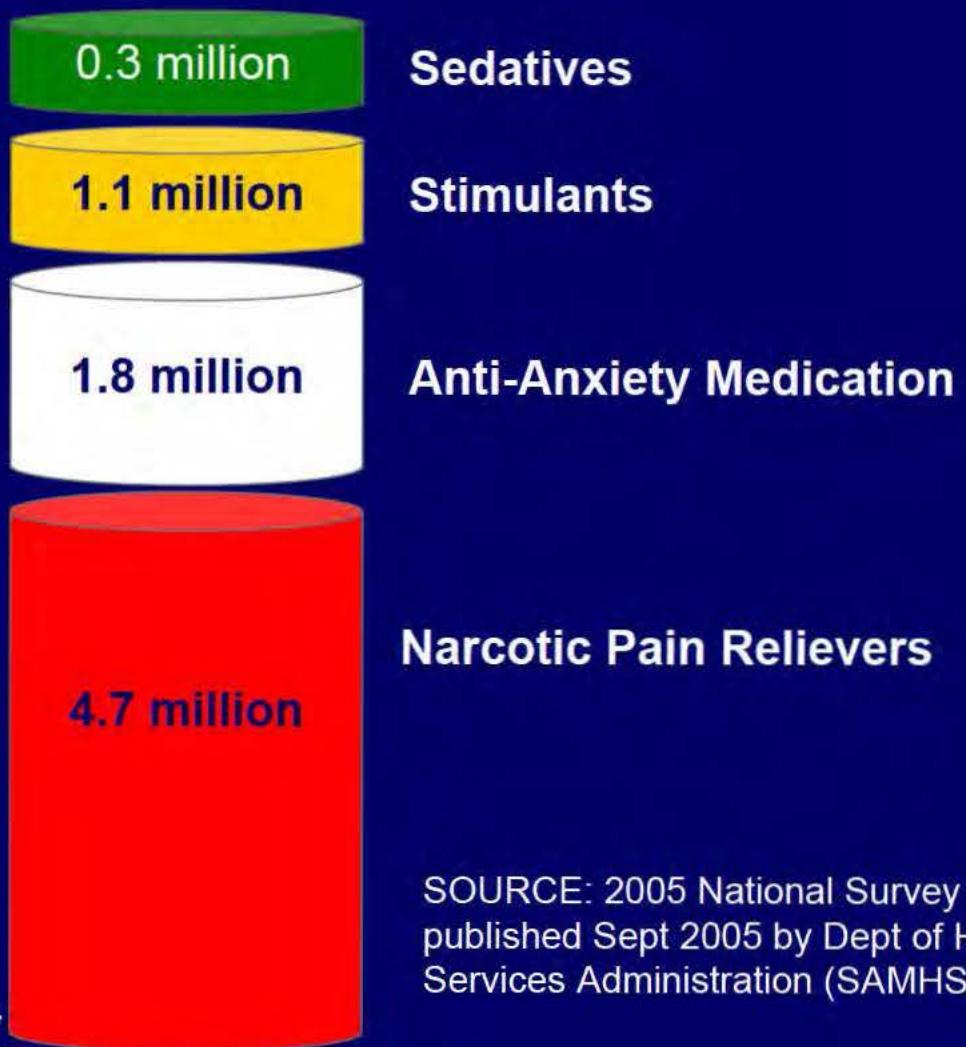
Trend in Prescription Drug Abuse

National Survey on Drug Use and Health, 2005:

- Estimated 6.4 million Americans (2.6%) aged 12 or older engaged in non-medical use of prescription medications in the last month. Of these:
 - Pain Relievers: 4.7 million
 - Anti-Anxiety (tranquilizers): 1.8 million
 - Stimulants: 1.1 million (Meth & Sedatives)



In 2005, 6.4 million Americans Age 12+ used a prescription drug for non-medical purposes in past month



SOURCE: 2005 National Survey on Drug Use and Health (NSDUH), published Sept 2005 by Dept of HHS / Substance Abuse and Mental Health Services Administration (SAMHSA)



2005 Partnership and Attitude Study (PATS)*

- Alarming number of teens have a false sense of security about the safety of abusing prescription medications
- 19% of teens report abusing prescription medications to get high
- 40% believe that prescription medicines are “much safer” to use than illegal drugs
- 31% believe there’s “nothing wrong” with using prescription medicines without a prescription “once in a while”
- 29% believe prescription pain relievers are not addictive

*18th annual study of teen drug use and attitudes
Released in April 2006 by The Partnership for a Drug-Free America



Methods of Diversion

- Rogue Internet “Pharmacies”
- Inappropriate prescribing
- Illegal sales
- Employee theft
- Prescription rings
- Doctor shopping
- Fraudulent prescriptions
- Pharmacy theft
- Foreign diversion and smuggling into the U.S.
- “Pharming”



Schedule II Controlled Substances

- High potential for abuse
- Currently accepted medical use
- Abuse may cause severe psychological or physical dependence



Schedule II Controlled Substances

- Attention Deficit:
 - Amphetamine Mixture (Adderall®)
 - Methylphenidate (Ritalin®)
- Opioids:
 - Methadone
 - Oxycodone
 - OxyContin®, Percocet®, Percodan®, Tylox®
 - Morphine (MS Contin®)
 - Hydromorphone (Dilaudid®)
 - Fentanyl
 - Actiq®, Duragesic®



Schedule II Prescriptions

- Written prescriptions only, except in the case of an emergency
- The refilling of a prescription for a schedule II controlled substance is currently prohibited
 - On September 6, 2006, DEA published a Notice proposing to allow practitioners to provide individual patients with multiple prescriptions, to be filled sequentially, for the same schedule II controlled substance, with such multiple prescriptions having the combined effect of allowing a patient to receive over time up to a 90- day supply of that controlled substance. The comment period closed November 6, 2006.



Schedule II Prescriptions

- The partial filling of a schedule II prescription is permitted under the following conditions:
 - The pharmacist must make a notation of the quantity supplied on the face of the prescription, or written record of the oral prescription.
 - The remaining portion of the prescription must be filled within 72 hours of the first partial filling to be valid. If not, the pharmacist must inform the practitioner, and no more schedule II medication may be dispensed without a new prescription.
- The partial filling of a schedule II prescription is permitted for a patient in a LTCF, or a patient with a documented medical diagnosis for a terminal illness.
 - This prescription may be partially filled in quantities to include individual dosage units, and is valid for a period not to exceed 60 days from the date of issuance (or unless the medication has been discontinued).



Schedule II Prescriptions

- A faxed schedule II prescription may only be dispensed provided that the original, signed prescription is presented to the pharmacist first.
 - However, a faxed schedule II prescription may serve as the original prescription in the following instances:
 - If it is to be compounded for the direct administration to a patient by parenteral, intravenous, intramuscular, subcutaneous or intraspinal infusion.
 - If for a resident in a Long Term Care Facility.
 - If for a patient enrolled in a hospice care program certified by Medicare or licensed by the state, and is so stated on the prescription.



Schedule III Controlled Substances

- Potential for abuse lower than Schedule II
- Currently accepted medical use
- Abuse may cause moderate or low physical dependence or high psychological dependence



Schedule III Controlled Substances

■ Opioids:

- Hydrocodone
 - Lorcet®,
 - Lortab®,
 - Vicodin®
- Codeine with Acetaminophen
 - Tylenol with Codeine (#3, #4)



Schedule IV Controlled Substances

- Potential for abuse lower than Schedule III
- Currently accepted medical use
- Abuse may cause limited psychological or physical dependence



Schedule IV Controlled Substances

- Benzodiazepines:
 - Alprazolam (Xanax®)
 - Clonazepam (Klonopin®)
 - Diazepam (Valium®)
 - Lorazepam (Ativan®)
- Non-Benzodiazepine Hypnotic:
 - Zolpidem (Ambien®)
- Opioids:
 - Butorphanol Tartrate (Stadol®)
 - Pentazocine/Naloxone (Talwin NX®)
- Stimulants:
 - Phentermine (Ionamin®, Fastin®, Adipex-P®)



Schedule III - V Prescriptions

- Written, facsimile, or oral prescriptions reduced to writing
- Prescription refills for schedules III - V controlled substance are allowed under the following conditions:
 - With medical authorization, up to five (5) refills within six (6) months after the date of issuance of the prescription
- Partial filling of a prescription for schedules III – V is allowed under the following conditions:
 - Each partial fill is recorded on the back of the prescription (or other appropriate document), including: the quantity dispensed, the date, and the initials of the dispensing pharmacist
 - No dispensing is permitted six (6) months after the initial date of issuance of the prescription



Non-Controlled Substances

- Potential for abuse lower than Schedule V
- Currently accepted medical use
- Abuse may cause limited psychological or physical dependence



Non-Controlled Substances

- Analgesic:
 - Tramadol (Ultram®, Ultracet®)
- Muscle Relaxant:
 - Carisoprodol (Soma®)
 - Cyclobenzaprine (Flexeril®)
- Cough Suppressant:
 - Dextromethorphan (DXM)
 - Over-the-Counter (OTC) cold medication, such as:
Coricidin HPB Cough and Cold Tablets and
Robitussin Cough Syrup.



Prescription Requirements

	Schedule II	Schedule III	Schedule IV	Schedule V
Written	Yes	Yes	Yes	Yes
Oral	Emergency Only*	Yes	Yes	Yes
Facsimile	Yes**	Yes	Yes	Yes
Refills	No	Yes#	Yes#	Yes#
Partial Fills	Yes***	Yes	Yes	Yes

* Must be reduced in writing, and followed by sign, hard copy of the prescription.

** A signed, hard copy of the prescription must be presented before the medication is dispensed.

*** 72 hour time limitation.

With medical authorization, up to 5 in 6 months.



Hydrocodone

- Vicodin®, Lortab®, Lorcet®
- DEA Diversion Drug Trend Report identifies hydrocodone as the most commonly diverted and abused controlled pharmaceutical in the U.S.





Hydrocodone Situation

- 2004 – United States used 99% of the global hydrocodone supply*
- Approximately 125 million hydrocodone prescriptions were dispensed in U.S. in 2005**
- Hydrocodone products are the most frequently prescribed drug in the U.S.
- Comparable 2005 data shows that hydrocodone was prescribed three times more frequently than any other controlled substance***

* 2005 INCB report

**IMS data

***RxList data

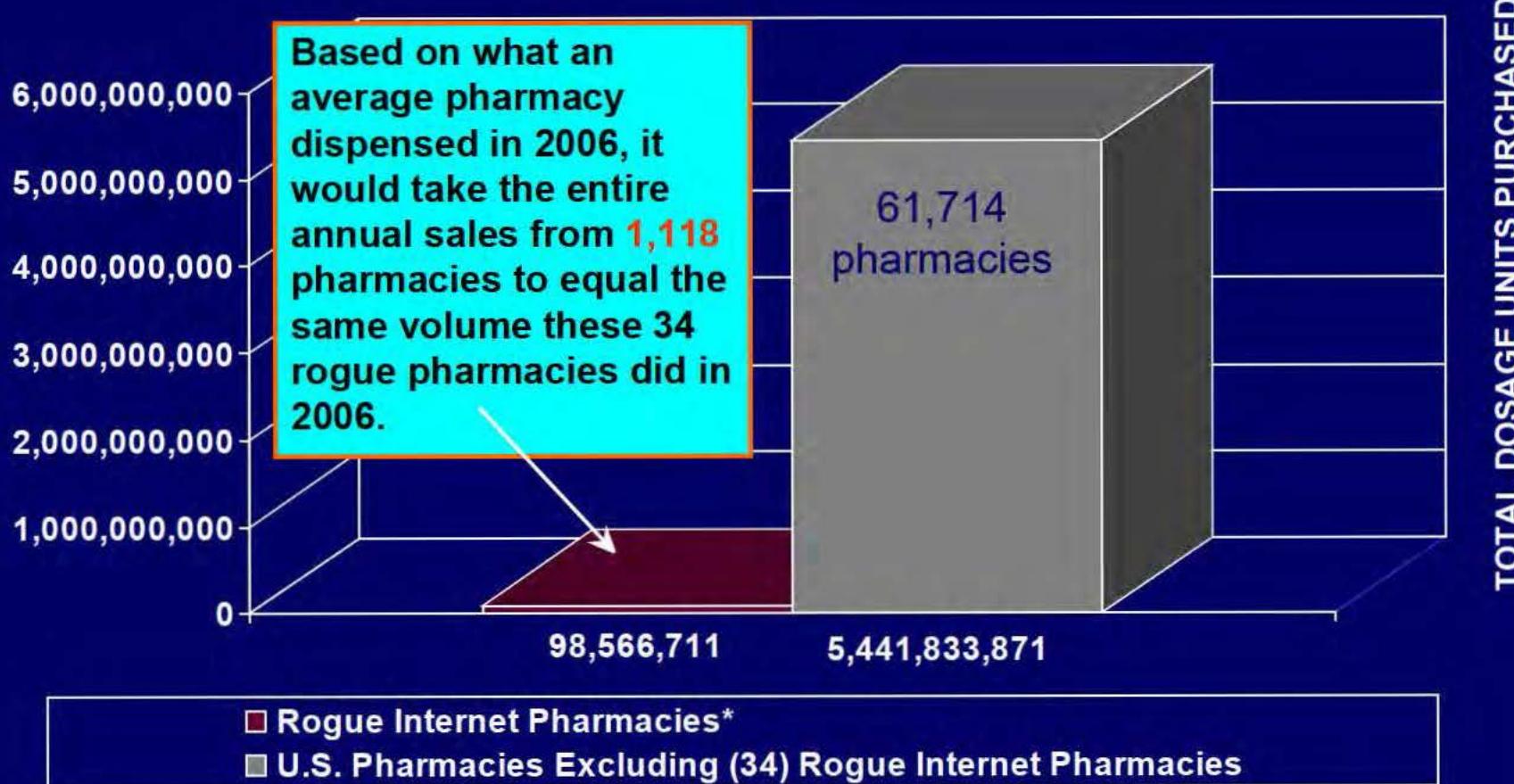


Hydrocodone Situation con't

- Hydrocodone is the most frequently encountered pharmaceutical in submissions of evidence to federal, state and local labs*
- DAWN 2005 data— from 2004-2005 emergency department visits involving nonmedical use of opiate/opioid pain medications increased 24% overall
- The Aggregate Production Quota for hydrocodone has increased 100% since 2000 (21,417 kg to 42,000 kg)



Comparison of CY2006 Purchases of Hydrocodone by Pharmacies



* Based on 34 Known and Suspected Internet Pharmacies



Impact of Rogue Internet Pharmacies

- CY-2006, just 34 known or suspected rogue Internet pharmacies dispensed **98,566,711** dosage units of hydrocodone (All of which was diverted)
- The maximum amount per legitimate prescription is 8 pills per day; therefore, these 34 pharmacies dispensed enough hydrocodone to supply **410,694** patients for one month.
- The average pharmacy dispenses 88,178 dosage units of hydrocodone, therefore it would take the **entire annual sales of hydrocodone from 1,118 pharmacies** to equal the amount dispensed by just 34 rogue Internet pharmacies.
- Because there is complicity amongst all of the participants of a rogue Internet scheme (e.g. doctor, pharmacist, Internet Facilitator, and “patient”) they have effectively eliminated all of the normal checks and balances.
- Other methods of diversion, by their nature, provide some constraints on the amount of controlled substances individuals can acquire over a given period of time. Other methods of diversion generally place the “patient” at a greater risk of being caught by law enforcement.

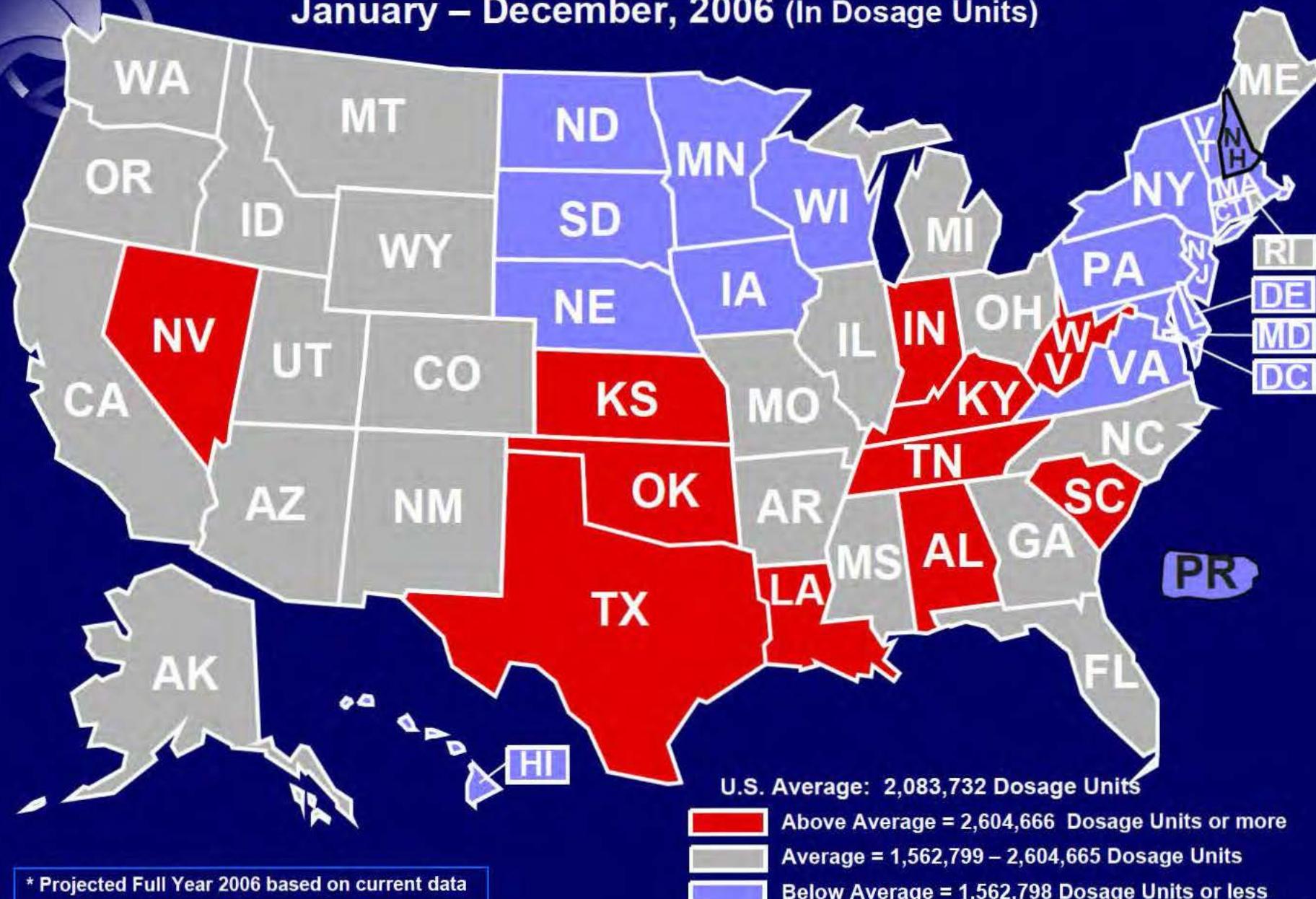


Impact of Rogue Internet Pharmacies (continued)

- In 2006, one rogue Internet pharmacy alone dispensed over **15.5 million** dosage units of hydrocodone.
- This significantly contributes to other downstream methods of diversion, (e.g. kids getting it from the medicine cabinet or family and friends). T
- DAWN data shows that ED visits related to nonmedical use of pharmaceuticals **increased 21 percent** from 2004 to 2005.
- The most recent Monitoring the Future study (8th, 10th, and 12th graders) indicates that only .8 percent get prescription drugs from the Internet while 47 percent get these drugs from family and friends. Though some kids are getting drugs over the Internet the majority of those getting hydrocodone from the rogue Internet pharmacies are older than those surveyed in MTF. (This is also supported by the most recent National Survey on Drug Use and Health which shows 15 percent of those surveyed ages 18 and older use pain relievers as opposed to 7.5 percent ages 12-17.)
- Additional perspective on the MTF survey: of the 47 percent getting prescription drugs from friends and family many are getting only small amounts such as a few pills at a time. The .8 percent that is attributed to the Internet, however, receives 100-120 pills at a time.

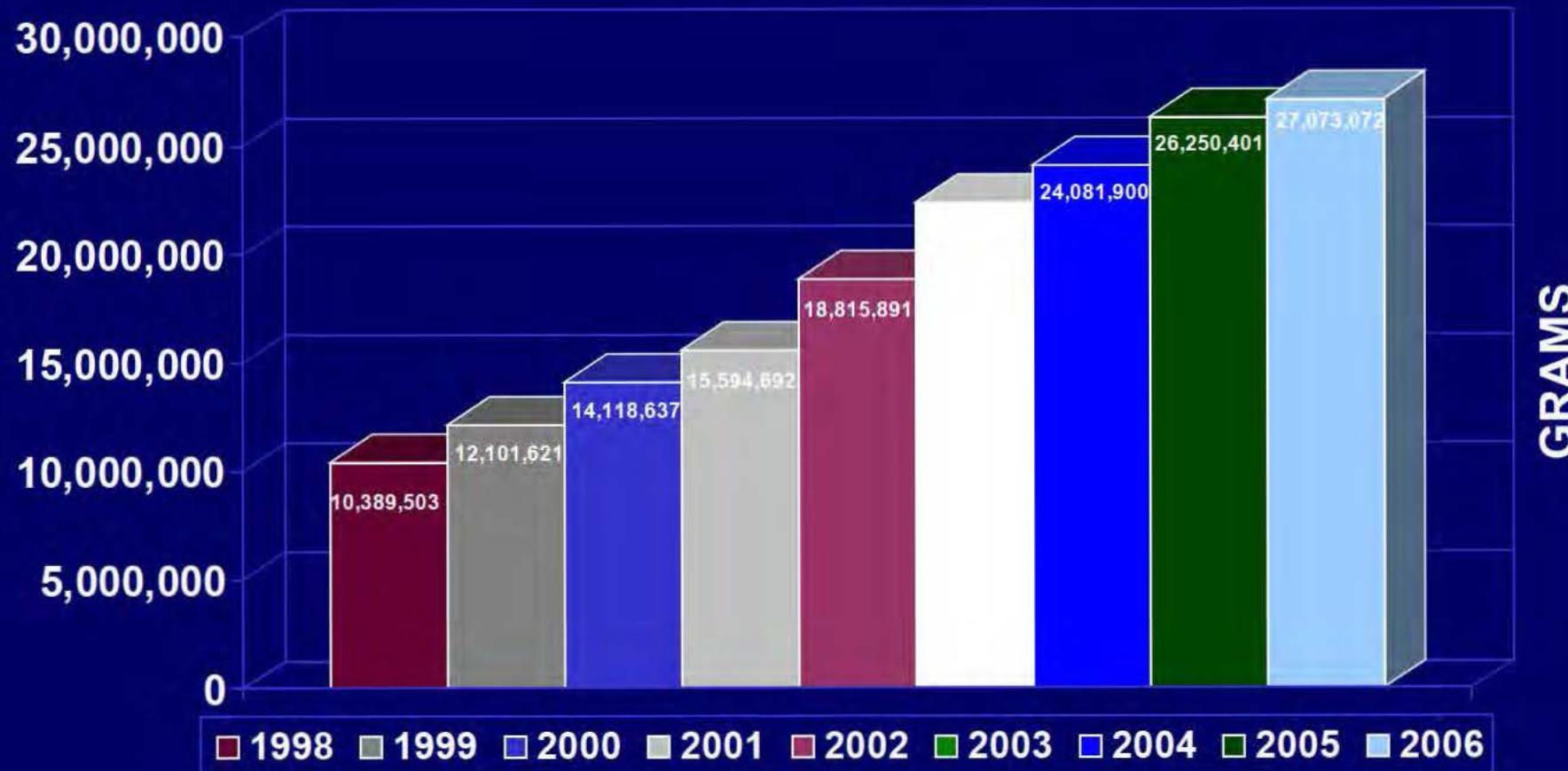
Hydrocodone Distribution Per 100,000 Population

January – December, 2006 (In Dosage Units)





Nationwide Hydrocodone* Distribution** 1998 – 2006 (In Grams)

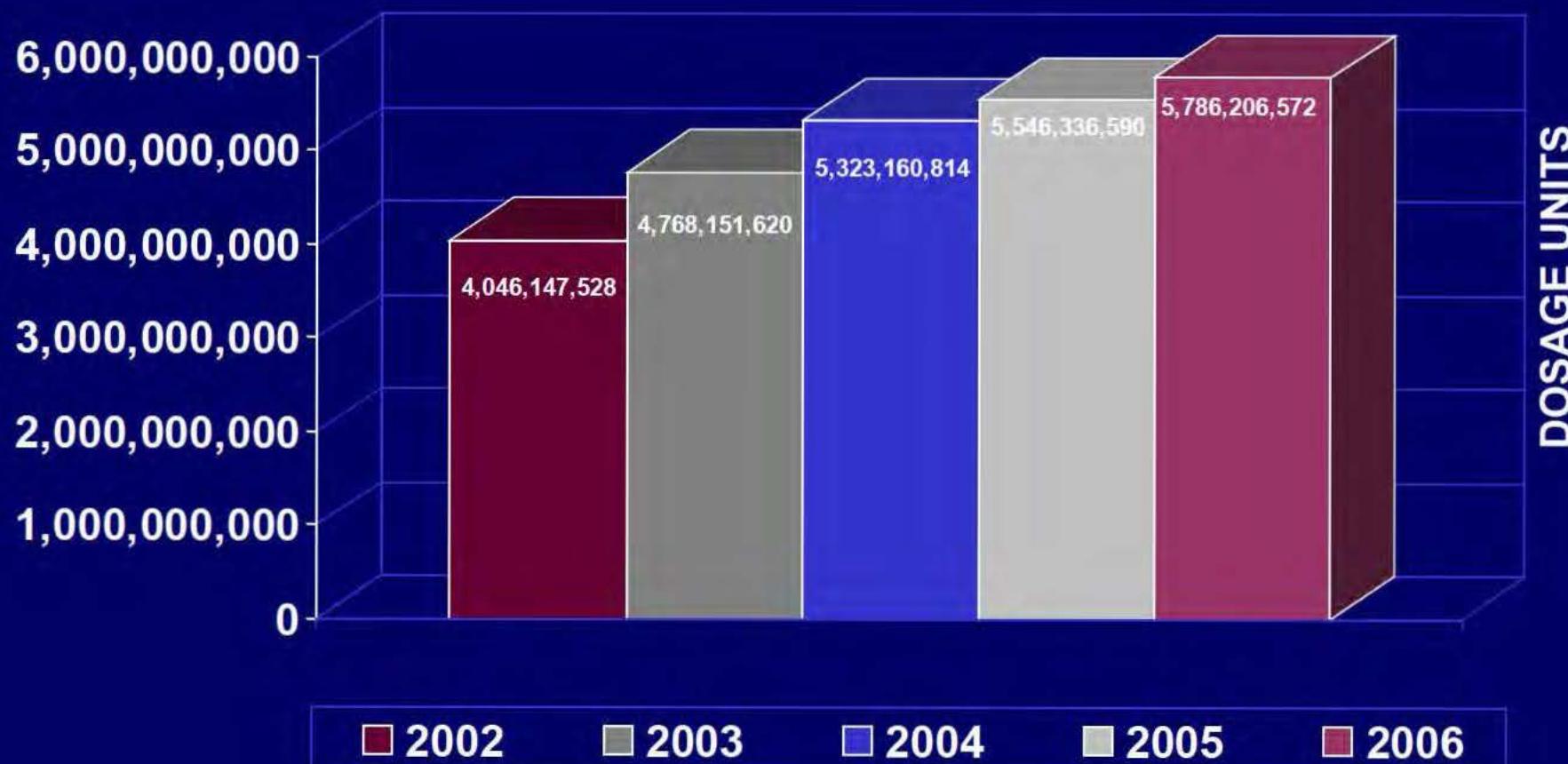


**Total sales to retail, i.e., pharmacies, hospitals, practitioners, and teaching institutions

* Projected Full Year 2006 based on current data



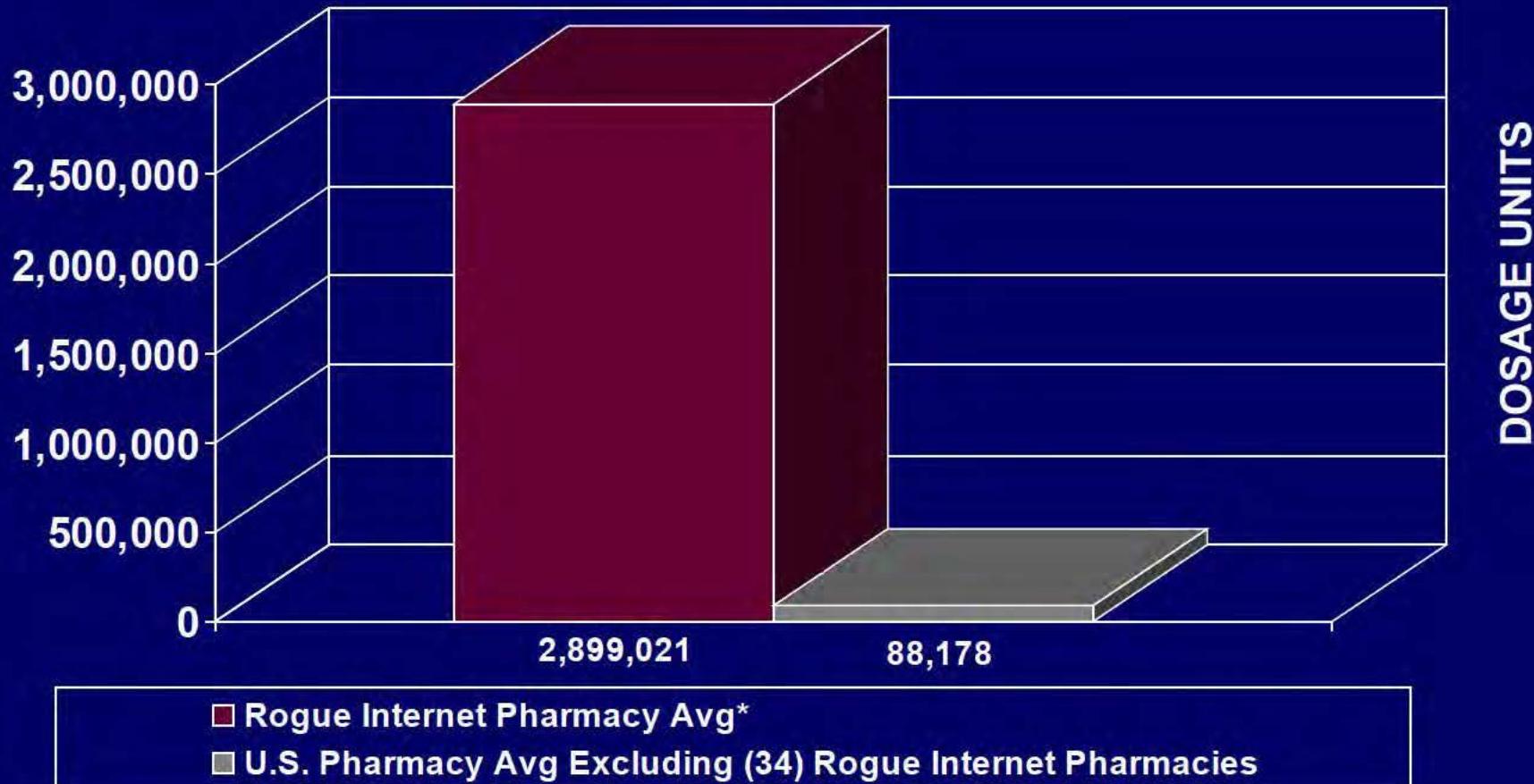
Nationwide Hydrocodone* Distribution 2002 – 2006 (In Dosage Units)



* Projected Full Year 2006 based on current data



Comparison of CY2006 Purchases of Hydrocodone by Pharmacies

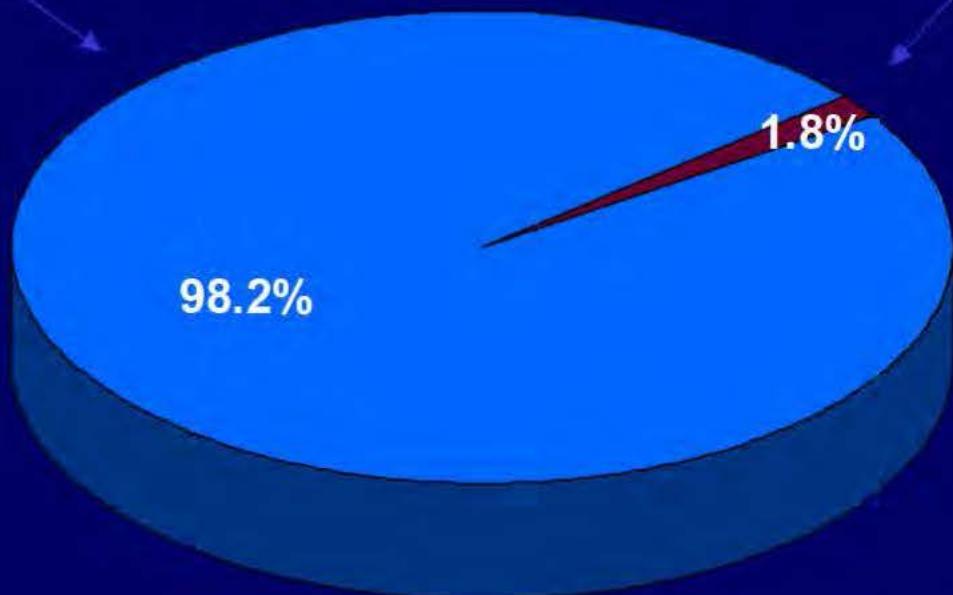


*Based on (34) Known and Suspected Internet Pharmacies
(as of 3/7/2007)

Comparison of CY2006 Purchases of Hydrocodone by Pharmacies

Remaining 61,714 Pharmacies *
5,441,833,871 Dosage Units Dispensed

34 Rogue Internet Pharmacies **
98,566,711 Dosage Units Dispensed



* Excluding (34) Rogue Internet Pharmacies

** Based on (34) Known and Suspected Internet Pharmacies



Alprazolam Xanax® (Z-bars)

- Brand name formulation of alprazolam
- Part of the class of drugs called benzodiazepines, more commonly referred to as 'benzos'





OTHER SUBSTANCES

- Tramadol
- Phentermine
- Phendimetrazine
- Soma



Internet Pharmacies





Emergence of Diversion via the Internet

- Originally aimed primarily at users of 'life style' drugs (Propecia, Viagra) wanting anonymity
- Now targeting individuals seeking controlled pharmaceuticals, mainly Schedules III-V





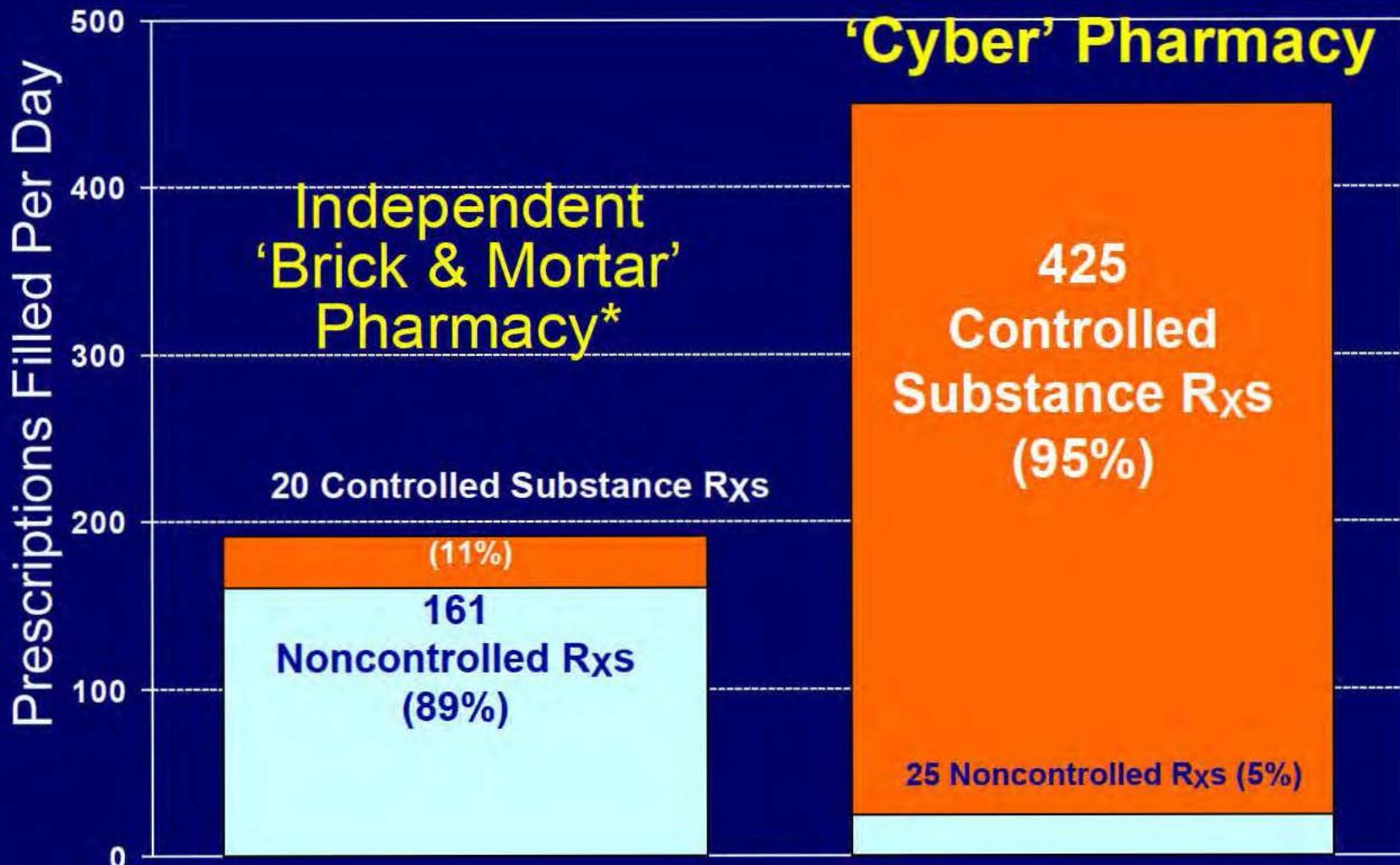
Scope of the Problem in the U.S.

- Number of online pharmacies / size of the market for rogue drug sellers unknown and difficult to track
- Estimates put the current volume of offshore drug shipments to U.S. consumers at 20 million drug packages annually, an increase of over 1,000% in just two years (U.S. Senate Permanent Subcommittee on Investigations)
- Consumers purchasing controlled substances from online “pharmacies”, physicians, and other sources do so without traditional protections
 - No doctor / patient relationship established
 - Circumvents existing federal and state laws, regulatory protection



Cyber vs. Brick & Mortar Sales

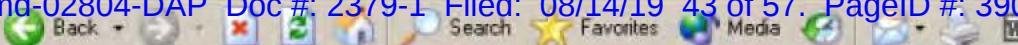
Average Sales





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Hydrocodone Drug RX

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Hydrocodone is an effective antitussive (anti-cough) agent, and as an opiate it is also an effective analgesic for mild to moderate pain control. Five mg of hydrocodone is equivalent to 30 mg of codeine when administered orally. Early comparisons concluded that hydrocodone and morphine were equivalent for pain control in humans. However, it is now considered that a dose of 15 mg (3/4 gr) of hydrocodone is equivalent to 180 mg (3 1/2 gr) of morphine. Hydrocodone is considered to be morphine-like in all respects. All content within cheap-hydrocodone.com is provided for general information only, and should not be treated as a substitute for the medical advice of your own doctor or any other health care professional.

Rx - Hydrocodone (Acetaminophen)

22 P.R.S. 22 OVERNIGHT 22 LAMERS 22 ONLINE EXCHANGES 22 CONTACT US

ADDITION

You should know that when hydrocodone is used over a long period of time, the body becomes dependent on hydrocodone and begins to require more of the drug (hydrocodone addiction) to attain the same effect. It is very important to take hydrocodone exactly as directed by your doctor or pharmacist to avoid hydrocodone addiction. [hydrocodone addiction](#)

PRESCRIPTION

Hydrocodone is a semi-synthetic narcotic analgesic (pain reliever) and a cough suppressant, similar to codeine. The hydrocodone is an opiate prescribed for the relief of moderate to moderately severe pain, mainly for back pain and migraine headaches. Recently, hydrocodone has come under fire for being a heavily abused prescription drug. [hydrocodone prescription](#)

DESCRIPTION

Hydrocodone is a semi-synthetic opiate agonist and is similar to other phenanthrene derivatives, such as other phenanthrene derivatives, such as codeine. Hydrocodone is a hydrogenated-ketone derivative. Hydrocodone drug is only available in combination with other agents and is used as an analgesic and as an antitussive. As an analgesic, hydrocodone is used to treat moderate to moderately-severe pain and is usually combined with paracetamol (acetaminophen), ibuprofen or aspirin as tablets, capsules and liquid preparations. [hydrocodone description](#)



PageRank 1

Hormones safer for younger women, experts advise
Thursday, January 26, 2007

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Hydrocodone

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GENERIC VICODIN

Vicodin (Hydrocodone) is related to codeine and is in a class of drugs called narcotic analgesics. It is used to relieve pain. Side effects include lightheadedness, drowsiness, nausea, and vomiting. Other side effects include drowsiness, constipation, and spasm of the uterus, which can lead to difficulty in urinating.

Hydrocodone gained its popularity in 1978 when the Food and Drug Administration approved the drug Vicodin - a combination of hydrocodone and acetaminophen. It is one of the nation's most widely prescribed medications and is currently considered by the DEA to be the most abused prescription drug in the United States. A drug that is most commonly used to relieve moderate to severe pain, hydrocodone is best known for its ability to cause a state of calm and euphoria. However, as attractive it may sound, this powerful painkiller has that ability to cause dependency and even death in unsuspecting users.

SIDE EFFECTS

Hydrocodone side effects, that may go away during treatment, include dizziness, drowsiness, lightheadedness, constipation, nausea, or vomiting. If they continue or are bothersome, check with your doctor. CHECK WITH YOUR DOCTOR AS SOON AS POSSIBLE if you experience rash or itching. [hydrocodone side effects](#)

INFORMATION

Hydrocodone relieves pain. Acetaminophen is a less potent pain reliever that increases the effects of hydrocodone. Together, acetaminophen and hydrocodone are most commonly used to relieve moderate-to-severe pain. [hydrocodone information](#)

OVERDOSE

A medically usual dosage of hydrocodone and acetaminophen is in tablet form, consisting of 5mg or 7.5mg hydrocodone/300mg acetaminophen, and should be taken with food. The precise mechanism of hydrocodone is not known, although it is believed to relate to opiate receptors found in the brain. It is believed to relate to opiate receptors found in the central nervous system. [hydrocodone overdose](#)

Pregnancy stress harms baby brain

Friday, January 26, 2007

Children whose mothers were stressed in pregnancy are vulnerable to behavioural problems, evidence shows. [read more](#)

Shopping voucher plan for addicts

Friday, January 26, 2007

Drug addicts should be given shopping vouchers to help them kick their habit, the NHS adviser body suggests. [read more](#)

Hydrocodone Resources

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Hydrocodone should be kept away from children. Do not share hydrocodone with others. Do not drink alcohol while taking hydrocodone. Do not take acetaminophen and hydrocodone with others for whom it was not prescribed, since they may have a problem that is not effectively treated by hydrocodone.

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Hydrocodone is habit forming. It is possible become physically and/or psychologically dependent on the hydrocodone drug. Do not take more than the prescribed amount of hydrocodone or take it for longer than is directed by your doctor. Withdrawal effects may occur if **hydrocodone** and acetaminophen is stopped suddenly after several weeks of continuous use of hydrocodone.

Rogue “Pharmacy” Web Site

Q. How do I place an order?

A. When you click an Order link, you will be taken to our secure server where you will set up your account. You will answer an online questionnaire to provide information relevant to your medical condition. Once you complete the questionnaire, you will see a confirmation page to review your answers for accuracy. At this point, you will submit your order for processing.

Q. Can I order by phone or fax?

A. No, we only accept orders through our secure server on the Internet. Our low prices are due in part to a highly streamlined, automated process.

Q. What forms of payment do you accept?

A. We COD only. Only MONEY ORDERS OR CASHIERS CHECKS. We do not accept Cash or Personal Checks.

Q. How will the package arrive to me? Will people be able to disclose it's contents?

A. All packages are shipped in plain packaging to protect your privacy.

Q. I am very impressed with your prices and service. How do I reorder?

A. Your password was sent to you via e-mail. You can reorder through My Account.

[Return to Top](#)

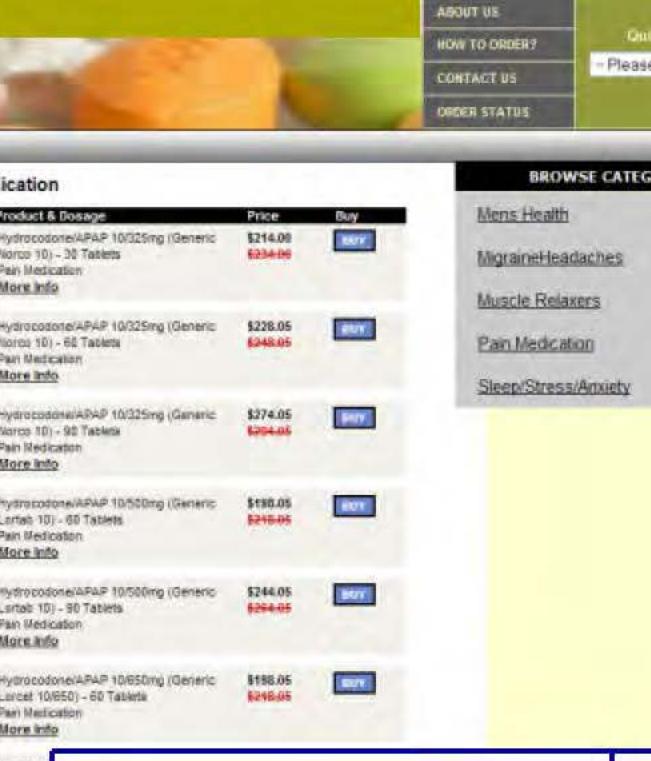
Q. How will the package arrive to me? Will people be able to disclose it's contents?

A. All packages are shipped in plain packaging to protect your privacy.

see a confirmation page to review your answers for accuracy. At this point, you will submit your order for processing.

Q. What Happens Once I Submit My Order?

A. All orders are processed through a secure server. Your information is not stored on our server. We do not keep any records of your order.

US Doctors US Pharmacy Legal Confidential Safe & Secure			
ABOUT US HOW TO ORDER? CONTACT US ORDER STATUS		Quick Buy >> - Please Select -	
Pain Medication			
Product & Dosage	Price	Buy	
Hydrocodone/APAP 10/325mg (Generic Norco 10) - 30 Tablets Pain Medication More Info	\$216.05 \$234.05	BUY	
Hydrocodone/APAP 10/325mg (Generic Norco 10) - 60 Tablets Pain Medication More Info	\$228.05 \$246.05	BUY	
Hydrocodone/APAP 10/325mg (Generic Norco 10) - 90 Tablets Pain Medication More Info	\$274.05 \$294.05	BUY	
Hydrocodone/APAP 10/500mg (Generic Lortab 10) - 60 Tablets Pain Medication More Info	\$198.05 \$216.05	BUY	
Hydrocodone/APAP 10/500mg (Generic Lortab 10) - 90 Tablets Pain Medication More Info	\$244.05 \$264.05	BUY	
Hydrocodone/APAP 10/650mg (Generic Lortab 10/650) - 60 Tablets Pain Medication More Info	\$198.05 \$216.05	BUY	
BROWSE CATEGORIES			
Mens Health			
Migraine/Headaches			
Muscle Relaxers			
Pain Medication			
Sleep/Stress/Anxiety			
			
Legitimate Online Pharmacy			
Hydrocodone 65 Tablets Pain Med More Info			Lortab
Hydrocodone 10/650mg 60 Tablets			

Legitimate Online Pharmacy

Lortab® 7.5/500

90 Tablets 7.5/500 mg

\$41.89

Product supplied is **generic**.

Rogue Internet Pharmacy

Lortab® 7.5/500

60 Tablets 7.5/500 mg

\$198.00

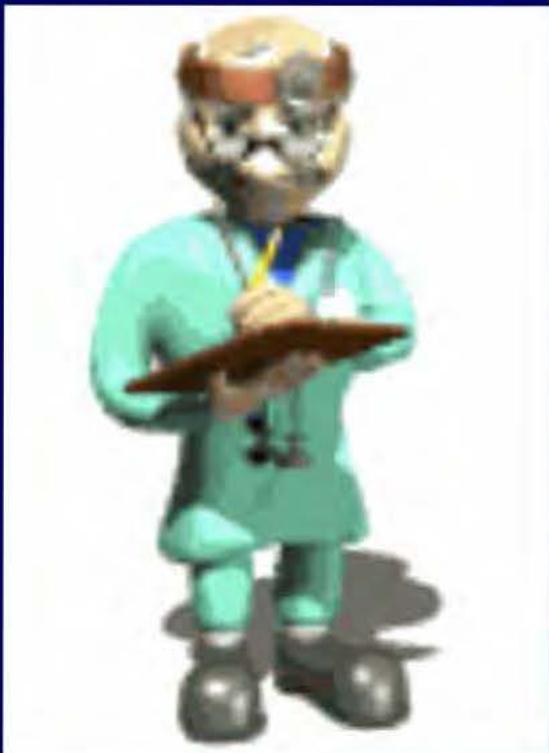
The Internet Facilitator



- Receives the email requests/questionnaires from the “patient”
- Receives payment from the “patient”
- Forwards the questionnaires to the doctor
- Pays the doctor
- Pays the pharmacies



The Doctor



- Receives email from Internet Facilitator
- No Face-to-Face Doctor-Patient relationship
- Sends prescription via email to rogue Internet Pharmacy
- Receives payment from Internet Facilitator
- Doctor repeats process 100s of times



The Rogue Pharmacy



- “Mom and Pop” Pharmacies
- No Chain Pharmacies
- Recruited and paid by the Internet Facilitator
- Generally does not know the doctor or the patient





Manufacturers

DEA Registrants who are authorized to produce and distribute controlled substances.
(1330 firms including all manufacturers and wholesale distributors)

Flow of Controlled Substances

..... Typical Internet Diversion Communications

Wholesale Distributors

DEA Registrants who are authorized to distribute controlled substances.

Manufacturers

[Re-packagers/Re-labelers]
DEA Registrants who are authorized to package bulk dosage units into consumer-use size packagers and distribute to pharmacies.

2. RIP sends order to practitioner

Rogue Internet Pharmacies (RIP)
Website Operators who Sell controlled substances over the Internet.
These entities are not registered with DEA and do not handle controlled substances.

Practitioners
DEA Registered doctors, nurse practitioners, etc. who are authorized to issue prescriptions for controlled substances.
(900,000 Practitioners)

Brick and Mortar Pharmacies

DEA Registrants who are authorized to dispense controlled substances to individual customers.
(64,000 registered pharmacies)

3. Practitioner sends prescription to pharmacy directly or through RIP

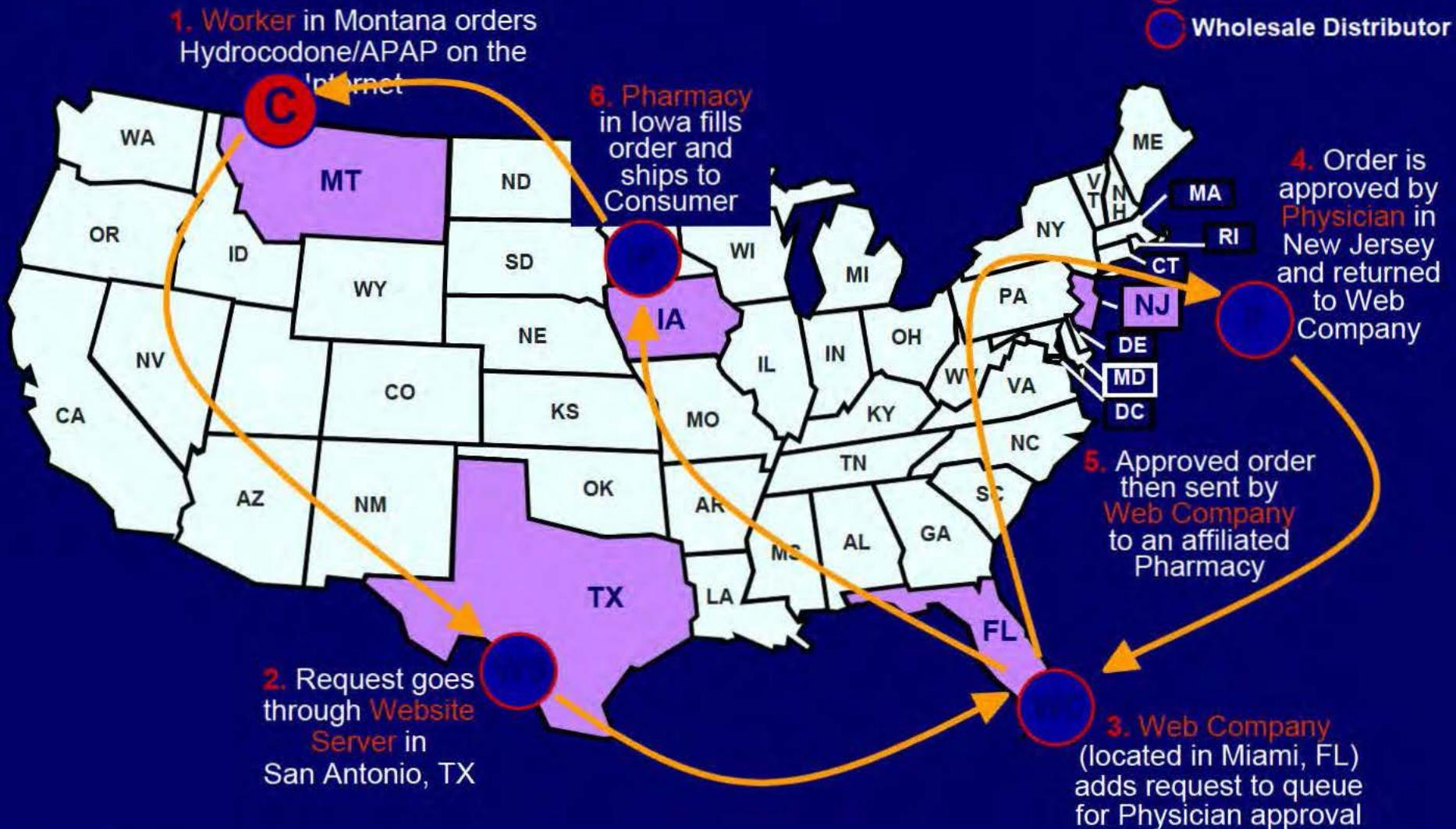
4. Pharmacy sends controlled Substances to customer

1. Customer places order over the Internet

Customers



Domestic 'Rx' Trail





Potential for Online 'Pharmacy' Gross Sales

Hydrocodone ONLY

Number of Orders for 100 units Hydrocodone Filled Per Day (On Average)	Wholesale Cost of 100 Units Hydrocodone (10/325mg)	Customer Pays To Fill Order	Payment By Web Broker For Each Order Filled	Total Received by Pharmacy Per Order	Average Number Days Operating Per Year	<i>Annual Gross Sales</i>
500	\$25	\$50	\$20	\$70	312	<i>\$7.02 million</i>

SOURCE: Based on review of Internet Pharmacy records in an ongoing DEA investigation



Potential Web Broker Gross Receipts

From **ONE** Pharmacy for **Hydrocodone ONLY**

Number of Orders For Hydrocodone Filled Per Day (On Average)	Consultation Fee Charged to Customer	Payment To Pharmacy For Each Order Filled	Payment To Doctor For Each Rx Written	Net Received by Web Broker Per Order	Average Number Days Operating Per Year	<i>Potential Annual Gross Receipts</i>
500	\$120	\$20	\$20	\$80	312	\$12.48 million

SOURCE: Based on review of Internet Pharmacy records in an ongoing DEA investigation



Comments / Questions?

